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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
The Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and
The Estate of Bernard L. Madoff,

Plaintiff,

v.

THE ESTATE OF DOROTHY D. FLANAGAN,

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04875 (SMB)

and

EDWARD J. FLANAGAN, in his capacity as
Executor of the ESTATE OF DOROTHY D.
FLANAGAN,

Defendant.

**NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE OF CERTAIN CLAIMS
IN ADVERSARY PROCEEDING**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq., and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel Baker & Hostetler LLP, and pursuant to Rule 7041(a)(1)(A)(i) of the Federal Rules of Bankruptcy Procedure (making Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure applicable in adversary proceedings), hereby dismisses the following claims in the above-captioned adversary proceeding with prejudice, but only as to Counts Two through Six of the Complaint. This Notice shall have no effect on or application to the Trustee’s remaining claims in Count One of the Complaint. Pursuant to Bankruptcy Rule 7041(a)(1)(A)(i), the Trustee is permitted to voluntarily dismiss claims in this adversary proceeding without further order of the Court by filing this Notice of Dismissal. As of the date hereof, defendants the Estate of Dorothy D. Flanagan, and Edward J. Flanagan, in his capacity as Executor of the Estate of Dorothy D. Flanagan have not filed or served an answer or a motion for summary judgment.

Dated: New York, New York
June 30, 2016

Of Counsel:

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Respectfully submitted,

/s/ Nicholas J. Cremona

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